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January 17, 2025

**By ECF**

The Honorable Brian M. Cogan  
United States District Court – E.D.N.Y.  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Full Circle United, LLC v. Bay Tek Entertainment, Inc., No. 20-cv-3395 (BMC)**

Dear Judge Cogan:

We represent Plaintiff Full Circle United, LLC (“Full Circle”) in the above-captioned action against Defendant Bay Tek Entertainment, Inc. (“Bay Tek”). We write this letter on behalf of all parties.

On January 15, 2025, Bay Tek filed a *Motion in Limine* to Exclude the Reports and Testimony of Laura Smith (the “Daubert Motion”). The Court has not yet set a schedule for the filing of *motions in limine* so the parties respectfully request that the Court approve the following briefing schedule for the Daubert Motion: (i) the Opposition to the Daubert Motion shall be filed by March 6, 2025; and (ii) the Reply in Support of the Daubert Motion shall be filed by March 20, 2025.

The parties are submitting this briefing schedule solely with respect to the Daubert Motion, with the understanding that any other *motions in limine* will be filed in accordance with a schedule set by the Court.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Bhandari', written in a cursive style.

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Rishi Bhandari